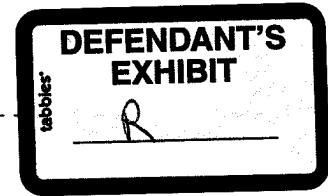


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

No. 1:12CV 1394



-----  
UNITED STATES of AMERICA,

Plaintiff,

v.

Terry S. Johnson, in his official capacity as  
Alamance County Sheriff,

Defendant.  
-----

Deposition

of

PAUL BRYON CROTTS

In Graham, North Carolina  
Wednesday, July 24, 2013  
3:04 p.m. - 4:38 p.m.

Reported by:  
Margaret M. Powell, CVR-M

1 just don't have any respect for him, so I stay away  
2 from him.

3 Q. Have you made phone calls to him?

4 A. Oh, yes, numerous times.

5 Q. And why was that? And why was that?

6 A. Has no bearings on this, I don't think.

7 Q. Well, but I'm asking you. You just said  
8 you stay away from him.

9 A. I do stay away from him.

10 Q. So the question is, do you make phone  
11 calls to him?

12 A. Sometimes I have.

13 Q. Okay. What was the nature of those  
14 phone calls?

15 A. Asking him to try to look into a  
16 homicide and do the right thing and to solve it.

17 Q. What homicide was that?

18 A. Gilliam homicide.

19 Q. And is this the one that your son had  
20 been accused of killing the Gilliams?

21 A. Gillams. [sic]

22 Q. Gillams?

23 A. Yes.

24 Q. I'm sorry, I'm ---

25 A. I know, you're from Cherokee.

1 around him. I don't like a liar.

2 Q. But you've indicated you were making  
3 phone calls to him?

4 A. Yeah.

5 Q. But you didn't want to talk to him?

6 A. On the recorder at night.

7 Q. Oh, so you've made the phone calls  
8 knowing he would not be there?

9 A. No, they screen the calls there, and  
10 they won't -- they won't -- he's not available, he's  
11 not available. Which I know he's there because I know  
12 his car is there. I -- I -- so be it. It's -- the  
13 Gillam homicide has nothing to do with this, what I  
14 witnessed at Rocky Top, nothing.

15 Q. Have you sent any letters to the  
16 sheriff?

17 A. Sent letters?

18 Q. Uh-huh (yes).

19 A. At first, I sent a couple of letters to  
20 him.

21 What's that got to do with Rocky Top?

22 Q. I'm handing you what's been marked as  
23 Exhibit 1. Could you identify that for me?

24 (Defendant's Crotts Deposition  
25 Exhibit Number 1 Marked.)

1           A.       Well, he had four investigators before  
2 the last one, and the last one he kept pushing them to  
3 hurry up, hurry up, hurry up, and Ben Scarborough said  
4 I'm not hurrying up. I'll take my time. And that's  
5 the reason Ben Scarborough is not there anymore, he  
6 couldn't work for the sheriff.

7           Q.       So then you -- I take it then the answer  
8 is you don't think the sheriff has done enough; is that  
9 right?

10          A.       No, I don't think he's done enough.

11          Q.       Do you blame the sheriff for not  
12 exonerating your son on Dateline?

13          A.       Do I? I think he could have said  
14 something more positive than what he did say.

15          Q.       Is that part of the reason why you've  
16 been making the phone calls and sending the letters?

17          A.       I will do whatever it takes for him to  
18 open his thick skull, open his blind eyes to that and  
19 another case that we have given him; and if it takes  
20 calling him every day, if it takes to send a Biblical  
21 statement like my preacher preached and it would slap  
22 Johnson right in -- I'll send it to him to wake him up.

23          Q.       And what is that other case?

24          A.       On an officer within the sheriff's  
25 department that killed a man.